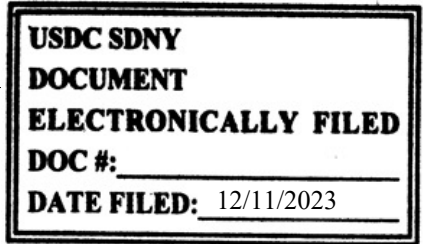


GETMAN, SWEENEY & DUNN, PLLC



VIA ECF

December 8, 2023

Honorable Katharine H. Parker  
U.S. District Court  
Southern District of New York  
500 Pearl Street, Room 750  
New York, NY 10007

Request GRANTD. A status conference is scheduled for **Wednesday, January 10, 2024** at 3:30 p.m. in Courtroom 17-D, United States Courthouse, 500 Pearl Street, New York, New York.

**SO ORDERED:**

A handwritten signature in black ink that reads "Katharine H. Parker".

**HON. KATHARINE H. PARKER**  
**UNITED STATES MAGISTRATE JUDGE** 12/11/2023

Re: *Bonilla et al. v. Lucero Produce II Corp. & Saul Lucero*, 22-CV-153 (AS) (KHP)

Dear Judge Parker:

We represent Plaintiffs in the above referenced matter. We write to request a status conference before Your Honor concerning Defendants' failure to execute the final settlement agreement in the above matter.

On September 11, 2023, the Parties entered into a settlement in principle and executed a binding term sheet at a settlement conference before Your Honor. The term sheet stipulated that the Court would maintain jurisdiction for enforcement of the agreement. On September 13, 2023, the Court So-Ordered the Parties' proposed Order consenting to Your Honor's jurisdiction. (Dkt. 57.) On October 12, 2023, Plaintiffs sent Defendants' counsel a final Settlement Agreement for Defendants' signature; this Agreement incorporated Defendants' counsel's requested revisions, and Defendants' counsel has represented that Defendants have agreed to all terms. The four Plaintiffs have signed the Agreement. Nonetheless, Defendants have not yet executed the Agreement, and there is growing concern among Plaintiffs that Defendants will not do so.

Accordingly, Plaintiffs request a conference before Your Honor on a date amenable to the Court, where we will seek guidance as to how to proceed, including whether Plaintiffs should file a motion to enforce the term sheet. It bears noting that Plaintiffs' counsel has prepared a near-final *Cheeks* approval motion ready to be filed with the Court once the Parties execute the Agreement. Thank you for Your Honor's consideration of this request.

Respectfully submitted,

/s/ Anamaria Segura  
Anamaria Segura

cc: All counsel of record